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State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62766-9276

217/982-6760

Refer to: L1630200005 -- St. Clair County
Sauget Sites (Area 1) -- Sauget
Superfund/Technical Reports

VIA AIRBORNE MAIL

January 21, 1994

Ms. Sally Jansen
Environmental Protection Specialist
USEPA-Region V, HSM-5J
77 West Jackson Blvd.
Chicago, Illinois 60604

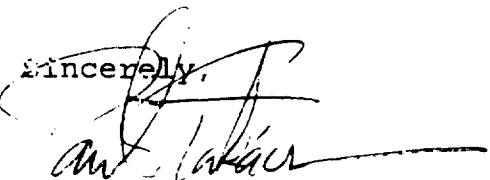
RECEIVED
JAN 25 1994

**SUPERFUND PROGRAM
MANAGEMENT BRANCH**

Dear Sally:

As requested, please find enclosed a summary of IEPA community contacts and interviewees for the Sauget Area 1 Sites. If you have any questions or need further background information, please call.

Sincerely,


Paul E. Takács, Project Manager
Federal Sites Management Unit
Division of Remediation Management
Bureau of Land



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

CONFIDENTIAL

MEMORANDUM

DATE: 1/19/94
TO: Paul Takacs, NPL-RPM *Paul*
FROM: Stan Black, Community Relations *Stan*
SUBJECT: Community Relations Contacts/Interviewees for Sauget Sites

As we had discussed, I am attaching copies of documents and notes from the CR-file for Sauget Sites, that may be useful in following up on contacts made by CR staff over the years with people who may have information pertinent to the PRP-search for Sauget Sites. I was greatly assisted in my search through the voluminous Sauget Sites CR file by the original CR Coordinator for this area, Keri Luly. As you know, Keri is now with IEPA's Office of Pollution Prevention, but she kindly offered to go through the file herself, making sure that we would not miss anything.

I have included entire documents rather than simply the names of the parties involved, so that those performing the PRP-search can see the context of the original contact, and the sort of information the party might be expected to have. To make it easier to sort through the documents, I have highlighted the names of the parties I thought might have relevant information on each document attached.

Please let me know if I can provide additional information or interpretation to help with this process.

cc: DIVISION FILE ✓
COLLINSVILLE REGIONAL FILE
Terry Ayers (w/o Attachments)
Greg Michaud (w/o Attachments)
Keri Luly (w/o Attachments)



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-5562

November 20, 1986

Mrs. Marian Locke
2409 White Street
Cahokia, Illinois 62206

Dear Mrs. Locke:

I have been in touch with our project manager for the Dead Creek study and he would like to meet with the person you described to me last month. If that person is willing to share his/her information about past waste dumping, etc., I'm sure we would find that useful.

An evening meeting would work out best for us since daylight hours tend to be tied up with sample collecting. If that is not possible, we can arrange a daytime meeting. Would the first or second week of December be convenient? I will contact you after Thanksgiving to set up the meeting.

Sincerely,

Ms. Keri Luly
Community Relations

KL:mfh/42

M E M O R A N D U M

St Clair Co. - 6-11-71

CAHOKIA - Alleged Chemical Discharge

TO: Bureau of Water Pollution Control

FROM: Eric W. Merz, Sanitarian, Mississippi Basin

DATE OF VISIT: March 16, 1971

INTERVIEWED: Joseph S. LIVigni, City Council Member
Roscoe Easteridge, Public Works Director

On March 15, 1971, the writer received a telephone call from the Mayor of Cahokia's secretary, Mrs. Saab. She explained that the previous day a yellow chemical substance was prominent throughout the major drainage ditch (termed Dead Creek) which serves the southwest portion of the city.

On the above date the writer met with Mr. Joseph S. LIVigni, Cahokia City Council member, and Mr. Roscoe Easteridge, Cahokia Public Works Director. Both gentlemen had observed the yellow substance in the ditch on March 14, 1971 but expressed doubt as to whether any trace was remaining. An investigation of the area where the alleged substance was located indicated no evidence of the above described substance being present. The area investigated was the drainage ditch at Queeny Avenue near Route 3 in Sauget. Mr. LIVigni indicated he suspected the alleged discharge to have come from the Waggoner Trucking Company, a chemical transport company located on Queeny Avenue adjacent to the drainage ditch. A brief inspection of the Waggoner property indicated no evidence to support Mr. LIVigni's suspicions.

It was explained to Mr. LIVigni and Mr. Easteridge that before the Agency can act on an alleged violation sufficient evidence must be obtainable to support the complaint. Both gentlemen were advised to immediately contact the writer if the alleged condition resumes.

Eric W. Merz

EWM/skv
cc: Mississippi Basin

DEAD CREEK NOTES

1970's

- 3/71 Yellow discharge in creek brought to attention of Eric Merz by Joseph S. LiVigni (Cahokia City Council member) and Roscoe Easteridge (Cahokia Public Works Director). Mr. LiVigni and Mr. Easteridge suspected discharge from Waggoner Trucking Co., a chemical transport company adjacent to DC, but no evidence found supporting that suspicion.
- 3&4/71 Eric Merz and Mike Neumann met Mr. Easteridge at DC. Contact made with Ernest Russell (Cahokia Health Officer) who had observed chemical in creek and felt it was from Cerro or Monsanto since DC originated there. Insufficient evidence. Mr. Merz met with Mike Foresman (Monsanto Pollution Control Engineer) who felt discharge could not be from Cerro or Monsanto because (A) Queeny Avenue culvert is blocked off and (B) stream bed grade causes water on north side of Queeny to flow north to Monsanto sewer (& onto Sauget STP). Recent dye tests and later additional tests by Monsanto showed no escape to south side.
- Joseph Goldenberg (Chief Engineer at Cerro) said same thing ~~_____~~ (resident) told Mr. Merz and Mr. Neumann he had frequently observed yellow substance in DC flowing south from under Queeny Avenue. He said culvert was not blocked off. A new culvert was put in 3-4 years previous for railroad switch for Cerro was installed. He said when they pump in and out of DC on north side, water level changes on south side.
- No follow-up on record in FOS.
- 4&7/71 Tanker trucks labeled corrosive were observed to be discharging contents to DC. Robert Schleuger notified Waggoner to stop it immediately and notify Agency as to method of abatement of discharge.
- 8/71 Reply from Waggoner: they have stopped discharge to DC and would be disposing in quarry pit instead.
- 2&3/73 Further discharging to DC observed by Agency personnel by Waggoner. Mike Neumann contacted Mr. Waggoner at his office. Mr. Waggoner said tanker truck washwater was being discharged into a circular hole approximately 100 yds. behind office (approximately 30' diameter, depth unknown) Oil on surface, no fence or warning signs, no construction permits. Mr. Waggoner said little acid left in trucks due to pressured unloading and oil probably from some barrels discarded nearby in previous years.
- 5/75 Ernest Russell (Cahokia Health Officer) contacted Larry Eastep about discharge to DC by Cerro. ~~Mr. Eastep is a resident of the area~~ was interviewed regarding his complaint about water from his well (adjacent to quarry pit "backwater" at DC) that he used on his orchids. After the heavy rains of May 5-12, water in the pit was reddish brown or orange and his orchids were then ruined.

At Queeny there was no flow but pools of water had yellow-orange color, banks and bottom were reddish orange. High water mark indicated creek had been almost 2' deep. Mr. Goldenberg and Mr. Foresman again stated that culvert was closed off at Queeny.

(COD = 36 mg/l, TDS = 890 mg/l, chlorides = 150 mg/l,
ammonia = 2.0 mg/l, iron = 3.2 mg/l, mercury = 0.1 ppb)

Downstream, quarry pit had dark reddish-brown water. 3 of 4 points in next 1/4 mile had less discoloration, 4th had none.

Mr. Eastep contacted Mr. Goldenberg at Cerro and saw 250' X 50' channel (about 20' deep) that was headwaters of DC until culvert was blocked. It had 6" water, reddish brown, flowing slowly toward diversion structure at north end. Uncertain whether channel backed up through culvert to DC or DC backed up to north through culvert (due to vegetation clogging it up.)

Samples done do not suggest Monsanto wastes present. Iron probably responsible for color but source unknown. (could even be from quarry pit)

1980's

9/80 Tom Powell and Ken Mensing sampled soil 9/17 and 9/25
Soil and water sample results 9/8/80 - 9/17/80 attached
Area 40 yd. north of Judith had highest contamination levels
(PCB's = 120 ppm, white phosphorus = 120,000 ppm, lead = 2400 ppm)

9/80 Jack Muraro's press release
Due to death from chemical burns of dog that had rolled in ditch, sampling of soil showed hazardous levels of PCB's, phosphorus, heavy metals and other toxic materials. Well at 101 Walnut, adjacent to pit, showed low levels of chlordane, PCB's and alkylbenzenes. Pit water showed normal metals levels, low levels of PCB's and aliphatic hydrocarbons. DOT snow fencing installed around creek and pit between Queeny and Judith.

No vapors unless ground disturbed in creek bed.
Reports of old buried landfill just south of Queeny, north of Waggoner property to be investigated.

9/80 newspaper clips:
It was reported that Leo Sauget operated immense landfill south of Queeny, west of Falling Springs Road from early in century till mid 60's. EPA had no record since first rules governing registration of landfills with state were passed in 1966 under jurisdiction of Public Health. A.G.'s office (Ann Carr) had "suspect" in case, but no investigation yet. IEPA reluctant to drill in area due to possible release of wastes from buried drums. Will use metal detectors first. Monsanto disposed of wastes in Sauget's landfill from 1917 till late 1920's.

9/80 Dan Bishop, Monsanto Director of Environmental Communications, quoted as saying that between 1971 and 1977 chemical wastes from Krummrich plant and other industrial firms was disposed of in Monsanto's on-site incinerators. Before 1971, they disposed of PCB by-products by burying them on-site at Sauget plant. Bishop said recent studies show PCB's do not cause cancer in humans and their toxicity has been overstated.

9/80 * Meeting of Mayor King, Mayor Sauget, J. Kelty, R. Schleuger, K. Mensing, W. Franke:
Middle of ditch divides the two towns so neither claims responsibility (neither do individual homeowners). Residents said Waggoner dumped various chemicals there (when washing his trucks). Waggoner died 4 years ago. Employee (~~Waggoner~~) continued dumping there til he died 2 years ago.
Most industrial wells in area closed except Cargill, but Schleuger said 2 municipal wells still open.

9/80 40 yd. North of Judith:
PCB's 120 ppm (5200 ppm 50 yd. S. of Queeny)
phosphorus 120,000 ppm
lead 2400 ppm

10/80 Newspaper clips:
Monsanto requested to do joint sampling with IEPA. Cahokia Fire Department refused to answer any more calls at DC unless life-threatening. No medical tests scheduled for 45 members of Volunteer Fire Dept. who have fought fires there more than 10 years. Agency to seek permission from industries to drill in area.

10/80 Letter from Stanley Parsons (IEPA, enforcement) to Thomas Owen (Cahokia) warning him against breaking down fence again

10/80 Woman called office to report that Rogers Trucking frequently released liquids into DC in late evenings as tankers were being rinsed out. She recalled old dump at corner of Queeny and Nickel. (Rogers occupied Waggoner property)

11/80 Newspaper Clips:
No public outcry or neighborhood groups. Peter Lauman moved to Houston. Samples taken by IEPA/Monsanto on 10-2-80 from northern, central and southern portions of creek bed showed:

	North	Central	South
(PCB s) →	10,000 ppm (IEPA)	350 ppm	73 ppm
	13,000 ppm (Monsanto)	240 ppm	45 ppm
(phosphorus) →	2,000 ppm (IEPA)	8,900 ppm	4,700 ppm
	2,550 ppm (Monsanto)	13,000 ppm	9400 ppm

Chlorinated benzenes (25 ppb) and chlorophenols (850 ppm) found in groundwater, but not in drinking water wells. Geologic structure may keep it out of wells but monitoring to continue to be sure.
Subsurface soil samples 3 blocks south of Judith (near where Cahokia Ave curves into Edwards Pl.) showed 100 ppm PCB's at 12" depth. Levels tend to decrease at deeper levels. PCB's too heavy to get down to river.

- 11/80 Vegetation sample approximately 30' west of DC, approximately 60' south of Queeny
beans - 0.06 ppm PCB's
leaves - 0.13 ppm PCB's
- 12/80 Newspaper clips:
USEPA Research Development Team (stationed in Las Vegas) to take aerial photos (possibly not til spring) to assist in pinpointing where drums are buried in old landfill northwest of DC. Photos to outline temperature variances in soil to locate high concentrations of chemicals. Tony Rutter (USEPA - Region V oil & hazardous materials coordinator) toured DC with John Renkes to determine eligibility for Superfund money. Site was considered for federal water pollution control act's revolving pollution fund, but U.S. Coast Guard declared it ineligible since surface water not threatened.
- 12/80 William Seltzer (IEPA Enforcement) letter to Reed Neuman requesting summary of DC investigation progress. Map dated 10/56 of sewer system under Monsanto revealed 36" overflow pipe ending at head of DC. (No reply found)
- 2/81 Newspaper Clip:
Air samples negative when soils undisturbed, but harmful vapors when disturbed. 12 groundwater wells sunk.
- 2/81 Test results of Cerro well and 2 lagoons. Tests to be redone due to dilution of samples with wash water by drill rig crew (as per letter from J. Renkes to J. Johnson at Cerro)
- 11/81 Memo to Bill Busch mentioning area (in Sauget?) that was used by Fed government to dump "very strong" materials in WW II.
- 7/82 Specs and Statement of Work (for new fence) mentions that the creek was blocked at Judith. Also lists industries that contributed wastes to DC before culvert was plugged in 1971 (Waggoner, Monsanto, Midwest Rubber, Chemical Warefare Service - Division of the US Army, Lewin Metals Co. ^{now} Cerro, American Zinc - now Amax, LuBright Refinery - now a Mobil Mkt'g Terminal and Empire Disposal)
- 7/82 T. Powell, M. O'Toole, P. Peck to site with 2 contractors to discuss chain link fence (approximately 4150') & 16' gate to be built in 8/82. Approximately 200' of IDOT snow fence stolen, other parts broken.
- 7/82 Phil Van Ness letter to Mike O'Toole (OSC for USEPA) granting authorization for USEPA contractors' access to property to build fence.
- 7/82 Mike O'Toole decided personal safety equipment not required for fence construction at site.
- 3/83 Heavy rainfall = high water in DC. Tonia Townsend reported water flow thru blocked culvert at Judith. T. Powell sampled on south side where water level was above culvert. Freeboard of 4-5' on north side indicates little chance of flow over Judith. Also sampled water flooding basement on Walnut. (Less than 0.1 ppb of PCB)

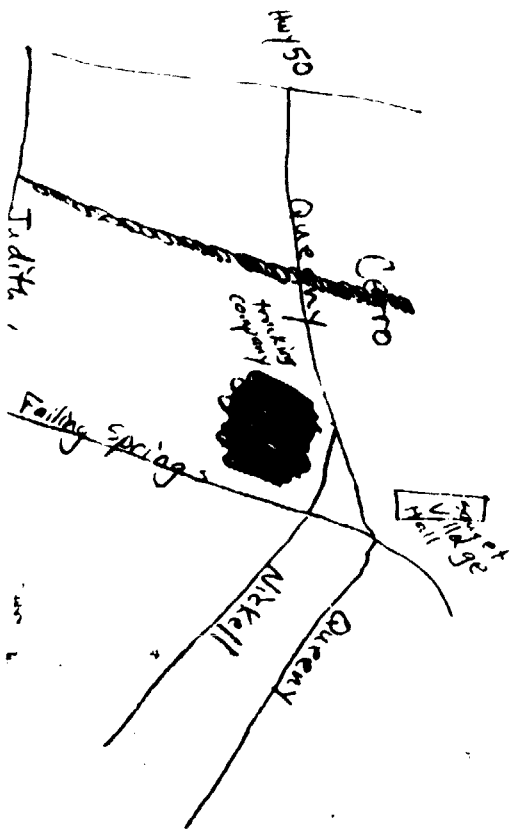
WHO?

Reed Neuman - A.G.'s Office 10/80
Joseph S. LiVigni - Cahokia City Council Member 3/71, 1984
Roscoe Easteridge - former (3/71) Cahokia Public Works Director, current
precinct officer
Mike Foresman - Monsanto Pollution Control Engineer 5/75
Ernest Russel - Cahokia Public Health Officer 5/75
deceased
Joseph W. Goldenberg - Cerro Chief Engineer 5/75
Harold Waggoner - (deceased as of approximately 1976) (332-6855)
H. Waggoner & Company Chemical Transporters 8/71
[REDACTED] Theresa's Flower Shop - next to pit
[REDACTED] - [REDACTED] citizens
Weise, Harold W. - property owner
[REDACTED] - ([REDACTED]) citizens, used to own and farm area
now industrialized in Sauget
Motogas - (332-8634) service station near site
Mineweld - (332-0595) business near site
Donald Elsaesser - property owner south of Judith
Thomas A. Owen - [REDACTED] broke down fence to dump, lives by pit
Albert (Peter) Lauman III - lived on Judith, south of pit; moved to
Houston 10/80. Dog died after rolling in DC 8/80
Dale Klohr - DOT district engineer who supervised DC fencing 1980
Rogers Trucking - occupied Waggoner property
[REDACTED] - Mt. Prospect citizen who wrote to IEPA re DC 12/80
William Seltzer - IEPA enforcement wrote to Reed Neuman in 1980 re status
of investigation
James Johnson - Cerro Copper 2/81
Rose Stillman - deceased - owned field south of Ruan. Contact Richard Stillman
332-1342
Ruan Transportation - operating in Waggoner building
Tonie Townsend - Cahokia Public Health person involved in DC since agency
1st became involved
Paige E. Peck - USEPA, procurement, fence for DC 7/82
Mike O'Toole - USEPA - involved in fencing DC 7/82
Ed Gentry - Granite City Fence - contractor who fenced DC 7/82
[REDACTED] - ([REDACTED]) lives next to pit, water in basement 1/83
[REDACTED] - ([REDACTED]) lives near DC had basement water sampled 2/83
[REDACTED] - ([REDACTED]) lives near DC wanted well water sampled 8/83
[REDACTED] - ([REDACTED]) Morningstar - had soil sampled 83
[REDACTED] - ([REDACTED]) live on Judith, next to DC 84
[REDACTED] - works in Cahokia Village Hall - very helpful 84
[REDACTED] - 64 - lived on Walnut since 1952 11/80
[REDACTED] 44 - lived on Edwards since 1947 11/80
[REDACTED] 64 - lived adjacent to DC since 1950 11/80
[REDACTED] 33 - neighbor whose 9 year old died of cancer 11/80

owns the ^{corner} ~~west~~ area between Queensy, Nickell & Falling Springs in Saugel

He wants to lease it to a trucking company, put gravel down for the trucks to drive on and install a cement pad & office trailer there. He wanted to know if our study would tear up that area and disrupt business. I told him I would check into it.

That area does seem to be a suspected dump site but I'm not not sure what conclusions E&E has drawn so far or what relevant info will come from the FS. Exhumation might be disruptive ~~but~~ but might not ever happen. What can we tell him?



I think this is the area he means but I don't know the boundaries - it's next to the existing trucking company. I think it's an old landfill.

XXXXXXXXXX

How long an area resident?

Ever witness dumping of drums or liquids in area?

Ever had to stop drinking well water?

Interviews 3/5/86

updated both notes & left extra fact sheets 3/5/86

spoke to Kahokia CofC & left copies 3/4/86

Walnut

at least 9 of 17 deaths
11 houses

cancer & heart attacks

112/ Monsanto - underground sewer to river for chemicals
Village Hall Dump - drums & everything

52, ~~48~~ 49, 48, 48, 50, 52, 40's

huge mound kids played on - Queeny & FS

~~XXXXXXXXXX~~ ~~XXXXXXXXXX~~ - long-time resident

101 Walnut

Note: "fs" is "FACT SHEET"

On Judith, #100 ^{Back} #105 are closest to creek
next to 105 are ~~some~~ ² trailers near the fenced pond
107 - left ~~fs~~ ^{is} in bdg, no one at trailers

~~100~~ garden

102 - have wells

102 - gardening/well water 20'

104 - garden - 44' well

104 Sierra Club - Kaskaskia ^R in Belleville

Sauget Village Hall on top a dump
refuse, etc from dump truck

Dept 250 (Monsanto) made

^{est}
~1954-55

← phosphoric acid & is source of phos in
Monsanto overflow to creek
creek went to packin

Steamfitter involved in building Monsanto

← retired & teaching at BMC
does take some jobs

~~██████████~~

~~██████████~~

★ ~~1946~~ watched Krum Drums being put in. from
Chemical warfare plant (now Ethyl)
field by drums is clear but
drums painted olive drab

Darling
Chemical
employee
at time

~~1946~~ flooding of creek

~~under~~ under Judith

near there were
several settling ponds

doubts whether its blocked off

at [redacted] - [redacted]

Village Hall Dump
PCBs, PCP,

Lubrite (Mobile Oil) dumped residues from
cracking unit

WWII
CWS = Chem Warfare Service

CC-2 - ?
24-D

benzylchloride residues

parking
fertilizer plant & others dumped there

AmerZinc, pre Cerro camp
dump on property
fenced beside
Village Hall

19th St RR tracks

Monsanto - 40 yrs. employee
resident here 35 yrs., in area entire life

along river - dumped everything
everybody

M E M O R A N D U M

CAHOKIA - Alleged Chemical Discharge
Dead Creek

TO: Bureau of Water Pollution Control, Surveillance Section

FROM: E. W. Merz, Sanitarian, Mississippi Basin

DATES: 3/31/71, 4/8/71

INTERVIEWED: Mr. Roscoe Easteridge
Cahokia Public Works Director

Mr. Ernest Russel
Cahokia Health Officer

Mr. Mike Foresman
Monsanto Pollution Control Engineer

Mr. Joseph W. Goldenberg
Cerro Copper & Brass Co.,
Chief Engineer

██████████
Mobile home owner living on Dead Creek at Queeny Avenue

On March 31, 1971, the writer received a phone call from Mr. Roscoe Easteridge, Cahokia Public Works Director, who said he received a report that a chemical discharge had recently been observed in Dead Creek at the Queeny Avenue culvert. (A similar report and consequent investigation took place on March 16, 1971. This investigation revealed no evidence to indicate a chemical discharge).

Following the telephone conversation, arrangements were made for Mike Neumann and myself to meet with Mr. Easteridge to examine the area of Dead Creek where the discharge allegedly took place. The examination of the area revealed no evidence supporting the discharge of a chemical substance. At the suggestion of Mr. Easteridge contact was made with Mr. Ernest Russel, Cahokia Health Officer, who personally observed the chemical in the creek. According to Mr. Russel, he observed a yellow substance in Dead Creek flowing in a southerly direction under the Queeny Avenue culvert and continuing downstream through Cahokia. Mr. Russel continued to say he felt the chemical originated at either Cerro Copper & Brass Company or Monsanto because Dead Creek begins at one or both of these company's property. Mr. Russel also said we might be able to get additional information from a ██████████ who first observed the discharge and lives in a mobile home on Dead Creek at Queeny Avenue. Unfortunately, ██████████ was not home.

It was explained to Mr. Easteridge sufficient evidence was not available at this time to prove a chemical discharge to have taken place but follow up investigation would be made in an attempt to get the evidence required.

It was next decided to contact Mr. Mike Foresman, Pollution Control Engineer for Monsanto. After explaining the situation to Mr. Foresman, he said he was reasonably sure the alleged chemical discharge could not have come from either Monsanto or Cerro Brass for two reasons. First the culvert running under Queeny Avenue is blocked off and secondly the grade of the stream bed lies in a way that the water on the North side of the creek flows in a northly direction and goes to the Monsanto sewer and eventually to the Sauget sewage treatment plant. Mr. Foresman said dye tests recently performed by Monsanto people confirmed this.

NOTE: Mr. Foresman later reported that additional dye tests performed by Monsanto personnel on April 6, 1971 revealed dye did not escape to the south side of the culvert.

During the course of the day, Mr. Joseph W. Goldenberg, Cerro Copper & Brass Co., Chief Engineer, was also interviewed. Mr. Goldenberg comments were basically the same as Mr. Foresmans. He did admit his company discharged directly to Dead Creek, but emphasized all water on the north side of the Queeny Avenue culvert, including what Cerro discharges does through the Monsanto sewer to the Sauget Sewage Treatment Plant.

On April 8, 1971, Mike Neumann and the writer returned to the area for the purpose of determining if a chemical discharge was taking place. We observed no evidence of a discharge but were able to talk to [REDACTED] who lives next to Dead Creek at Queeny Avenue. [REDACTED] confirmed what we heard from the City Health Officer, a yellow substance is frequently observed running in a southerly direction from under the Queeny Avenue culvert. [REDACTED] indicated he felt very strongly that the yellow substance originated at Monsanto or Cerro. It was next explained to [REDACTED] that both Monsanto and Cerro officials felt the discharge could not have come from them because the Queeny Avenue culvert is blocked off and the flow on the north side of the culvert is in a northerly direction. [REDACTED] strongly disagreed with the statement that the culvert is blocked off. He continued to say a new culvert had been installed three or four years ago when a railroad switch for Cerro was installed. [REDACTED] also said he knows the culvert is open because when "they" pump in and out of Dead Creek on the north side of the culvert it causes a significant water level change on the south side of the culvert.

[REDACTED] was requested to notify us the next time he observes the water level change or the chemical coming from under the culvert.

When scheduling permits, Monsanto and Cerro officials will be contacted and confronted with the information received from [REDACTED]. Follow up investigations will continue until a definite conclusion concerning the alleged chemical discharge can be reached.

Eric W. Meyer

EWM/cas
4/29/71

cc: Mississippi Basin ✓



MEMORANDUM

DATE: March 14, 1986
TO: Jeff Larson
FROM: Keri Luly
SUBJECT: Community Interviews in Sauget Sites Area

On March 4th and 5th I conducted community interviews in the Dead Creek area. The issues and information emphasized most strongly by the residents were:
1) past and present health concerns related to contaminants in the creek and
2) chemical dumping practices over the last 40 years.

Dead Creek currently originates on the Cerro Copper property, although two long-time residents recalled that it once originated farther north, and flows south through the Village of Cahokia. Many residents questioned the reason for partial fencing to prevent access only to the section of creek between Queeny Avenue and Judith Lane. "If the creek really is a potential health threat and we're advised to stay out, why isn't it entirely fenced?" The effectiveness of an old stream flow barrier under Judith Lane was also questioned by the long-term residents. People are especially worried because it is difficult to keep children out of the creek that cuts through their yards. Some of the yards are rapidly eroding into the creek and the uncontrolled weeds attract snakes, but residents have been advised not to attempt repairs.

If the potential threats presented by Dead Creek could be separated as an operable unit from the whole Sauget Sites study, community fears would be eased. Immediate sampling of the creek south of Judith Lane would determine whether a health threat actually existed before warm weather draws the kids back to the stream. The citizens and public officials would probably be less frustrated by the complexities of such a long-term study if the creek contamination was remedied more quickly.

Information about past chemical dumping practices and sites was brought out by one disgruntled former Monsanto employee and two retired residents. The former employee, who prefers to remain unnamed, told me about having emptied Monsanto's dumpsters into the Monsanto landfill along the river. Often times the dumpsters contained chemical drums, powders and liquids. He said that Coca Cola, Proctor & Gamble, Cerro Copper and other companies also dumped there. Trucks backed up to the hole, opened valves and emptied liquids that often caused burning sensations to people nearby. The employee was with Monsanto for over 10 years (until about 1983) and is willing to answer questions by phone.



Page 2

██████████ worked as a steamfitter at Monsanto and other local industries for over 40 years and now teaches at a local college. He said that the Village Hall of Sauget is built on top of one of the many old chemical dumps in the area. In 1954, ██████████ helped build Monsanto's (now defunct) Dept. 250, the source of Dead Creek's phosphorus. In 1946, he watched olive drab drums from the chemical warfare plant being buried in what is now referred to as the Krumrich Drum Site. He also knew of some chemical settling ponds used many years ago. ██████████ is willing to discuss these matters with the Agency and E & E.

██████████ worked for Monsanto for 40 years and has lived in that area all his life. He verified the chemical dump under the Village Hall of Sauget and stated that PCBs, PCP and other chemicals were dumped there. Mr. McDonnell also knew of other dumping in Sauget by Mobile Oil, Cerro Copper American Zinc and others. He is also willing to talk to the Agency and contractor.

Fact sheets have been distributed among local citizens, elected officials and media.

KL:bjh/0567F/53,54

Denying Paternity

Monsanto Case Shows How Hard It Is to Tie Pollution to a Source

PCBs Taint Site Where Firm
Used to Produce Them,
But It Doesn't See a Link

The Deadlock on Dead Creek

By SCOTT McMURRAY

Staff Reporter of THE WALL STREET JOURNAL

SAUGET, Ill. — Monsanto Co. enjoys a pretty good reputation among environmentalists. Beginning in the mid-1980s, it pledged to make sharp cuts in the amount of pollution it emits, with "zero waste" being the goal for many processes.

And this week, Monsanto announced a cash settlement with people who claim to have been hurt by some of its chemicals. It will pay \$39 million to neighbors of a defunct Texas refinery to which Monsanto, among other firms, once sold chemicals.

But here in the tiny Mississippi River town of Sauget, Monsanto is showing another side of its strategy on the environmental front. It is a strategy that some other companies are pursuing as well, in the face of potentially enormous cleanup liabilities. It's called denial.

Sauget is the home of more than a dozen toxic dump sites. The Illinois Environmental Protection Agency has been trying for years to get the area designated a federal Superfund cleanup site. Dumps containing carcinogenic PCBs, or polychlorinated biphenyls, are clustered along a stream aptly named Dead Creek.

Sauget is also the home of a huge Monsanto plant that was the only nearby producer of PCBs. In fact, until shortly before PCBs were banned in 1979, the Monsanto plant in Sauget was the nation's largest single source of PCBs.

Not Us

So could the presence of the toxic waste along Dead Creek and the Monsanto plant be a mere coincidence? Monsanto's answer to that question is an emphatic yes. "Anyone could have dumped a generator full of PCBs along the creek," says a Monsanto environmental officer, Steven Smith.

Battles over responsibility for toxic wastes are common where there are many possible contributors to a toxic site. But here, where there is but one likely candidate for the type of toxic waste at issue, environmental regulators had thought it would be easy to make the connection between pollution and polluter. The deadlock at Dead Creek suggests the process can be as easily stymied with one alleged major polluter as with 100.

Corporate denial of paternity for hazardous chemicals "is one of the biggest issues in toxic-waste cleanups," says Nicholas Valkenburg of Geraghty & Miller, an environmental consulting firm working for Monsanto.

Coincidence Defense

The problem isn't limited to specific industries or regions. Indeed, that the strategy should be embraced by a company with as good an environmental record as Monsanto shows how tempting it is. Unocal Corp. has denied that it is liable for toxic wastes found last year on an oil tank farm in San Diego that it owned for more than 60 years. The current owner of part of the property sued the oil company in federal court in San Diego earlier this year, alleging that the toxic wastes match products that haven't been stored there since Unocal sold the tank farm.

And in Azusa, Calif., high levels of contaminants were found in drinking-water wells just south of an Aerojet Corp. rocket plant, contaminants that matched toxic solvents used by Aerojet and others in the area for decades. The same toxic solvents also were found at a Sacramento plant site of Aerojet, a unit of GenCorp Inc. But it wasn't until last October — 13 years after discovery of the contamination — that Aerojet, without admitting responsibility for any wastes, agreed to reimburse the Environmental Protection Agency for a study of area water supplies.

One consequence of what some are calling the "coincidence" defense could be that taxpayers will end up shouldering more of cleanup costs. The Superfund toxic-cleanup law requires polluters to pay for most dump-remediation costs, but the pace has been slow; only 84 of the 1,245 Superfund sites have been totally cleaned since the law was passed in 1980, even though more than \$11 billion has been spent. To speed the process some critics are calling for shifting more of the burden, directly or indirectly, from corporate shareholders to taxpayers, notes Michael Silverstein, president of Environmental Economics, a Philadelphia consultancy.

"There is a sense out there that ultimately we're all responsible as consumers for the waste that has been produced," Mr. Silverstein says.

santo plant a half-mile to the north. "It's their wastes," Mr. Takacs asserts.

Monsanto's own contractor has trouble disputing the point. When asked if the match between wastes at the sites and wastes produced at the nearby plant don't suggest that Monsanto was responsible for both, Mr. Valkenburg of Geraghty & Miller says, "You could draw that conclusion."

Geraghty & Miller recently did a study of a pond and the creek section where the dog died. Mr. Valkenburg says it's too early to comment on the results. The Illinois EPA hasn't yet seen the study.

Environmentalists and industry often spar over the effect on human health of a few parts per million of PCBs. The threshold level above which the EPA considers PCBs to be toxic waste and a threat to human health is 50 parts per million. But at a dump near the intersection of Dead Creek and Queeney Avenue in Sauget, state investigators found PCBs in concentrations of no less than 74,000 parts per million in surface soils.

Monsanto's Mr. Smith says PCBs—oil compounds that transfer heat—once were a "ubiquitous product used by every major industry in the country." Although the Monsanto plant produced PCBs, the fact that their concentration is so high along Dead Creek doesn't prove they came from the plant, Mr. Smith says.

Superfund Application

Illinois has spent 12 years and \$1.3 million studying the area to try to get it listed as a Superfund toxic site. It is now sending the federal EPA its latest Superfund proposal, fattened by requested additional documentation. A Superfund listing would give regulators much more leverage. But a formal Superfund cleanup plan is still years away, they say.

One area polluter hasn't waited. Cerro Copper Products Co. agreed with the state EPA in 1990 to clean up a section of the creek next to its Sauget plant. It took that step mainly to beat a federal deadline that now bars sending any more toxics to special dumps; without a federal waiver, these wastes now have to be incinerated, at much greater cost. Cerro, a unit of Marmion Group Inc., spent \$12.8 million on cleanup and is trying to recover part of it from Monsanto, contending Monsanto contributed to pollution of the area it cleaned.

State regulators have had slightly better luck getting Monsanto to cooperate elsewhere in town. After years of negotiations, Monsanto signed a limited consent decree in February to study treatment alternatives at a dump on its own property next to the Mississippi River, where records show it dumped chemicals from 1954 to 1977. Monsanto has also agreed to pre-treat waste it sends to Sauget sewage plant, which regulators identified a few years ago as one of the worst sources of pollution on the upper Mississippi.

But chances are slim that much waste here will be removed or incinerated anytime soon. Monsanto didn't agree to study the option of incinerating the more than one million tons of wastes at the dump on its own property, a task that it estimates would take 23 years and cost \$540 million to \$720 million. Monsanto clearly favors less expensive treatments. "We may decide that the best course is simply to monitor the site," Mr. Smith says. Meanwhile, about 13 tons of local toxic wastes leach into the Mississippi each year, most of it from the Sauget dump, based on Illinois EPA figures that Monsanto doesn't dispute.

Monsanto says that projected toxic waste cleanup costs are too much for companies to bear. It proposes that government, academia and industry join forces to come up with a better technological solution. Richard J. Mahoney, Monsanto's chairman and chief executive, says, "Burning dirt is not my idea of high technology at work."

Cerro Sues Monsanto For Cost Of Cleanup

By Daniel R. Browning
Of the Post-Dispatch Staff

3/14/92

Cerro Copper Products Co. has filed suit seeking to force the Monsanto Co. and one of its subsidiaries to pay for the \$12.8 million cleanup of Dead Creek, a stream on Cerro's property in Sauget that was polluted with PCBs and other hazardous chemicals.

The suit, filed in U.S. District Court

in East St. Louis, contends that before August 1977 Monsanto's Krummrich Manufacturing Plant, at the northern end of the polluted stream, had been discharging waste water loaded with polychlorinated biphenyls, which are known to cause cancer.

Monsanto either knew or should have known that the toxic chemicals would intrude onto Cerro's property,

the suit says. As the generators of the hazardous substances and the owner-operator of the facility, Monsanto and Monsanto Chemical have engaged in "abnormally dangerous or ultrahazardous activities" and should be held strictly liable for all damages, the suit says.

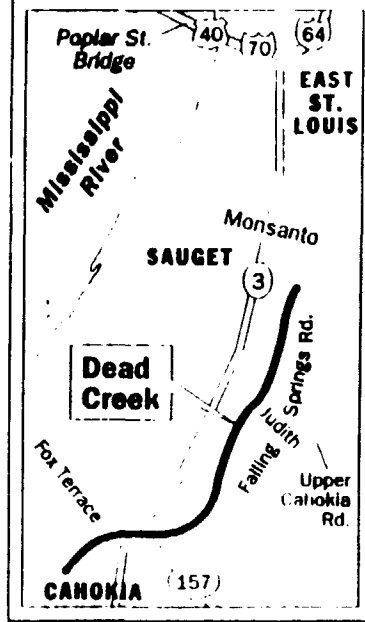
In 1990, the state of Illinois filed suit against Cerro under the Comprehensive

Environmental Response, Compensation and Liability Act to force it to clean up the property. Cerro entered a consent decree to clean up the property, resolving that suit.

Since then, Cerro has spent about \$12.8 million to clean up Dead Creek, the company says in its lawsuit. Cerro wants the court to declare Monsanto

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Polluted Creek



Tom Borgman/Post-Dispatch

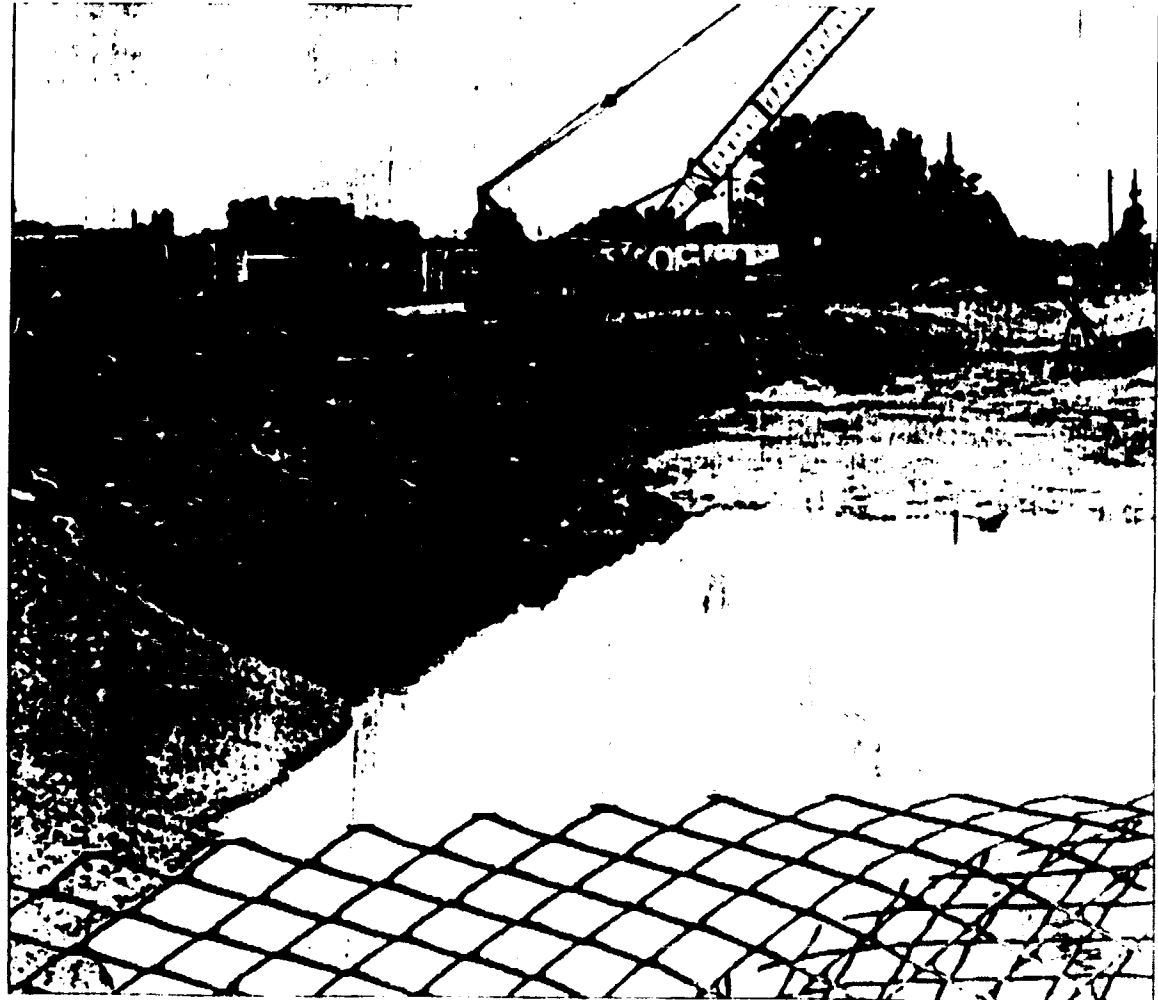
Cerro

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and Monsanto Chemical companies jointly and severally liable for the reimbursement costs, legal expenses and accrued interest.

The suit was filed Wednesday in U.S. District Court in East St. Louis, but it was not served immediately on Monsanto because the paper work had not been completed properly and had to be redone, a clerk said.

A spokesman for Monsanto Chemical, Kevin Cahill, said the company's attorneys were reviewing the suit on Friday.



Robert LaRouche/Post-Dispatch

Dead Creek, once contaminated with PCBs and other chemicals, is the subject of a lawsuit filed this week. The suit seeks payment for the \$12.8 million cleanup costs.

"We are disappointed that Cerro Copper Products Co. has chosen to take this action," Cahill said.

"Cerro decided on its own to do the remediation work in Sector A of Dead Creek, in agreement with the Illinois

Environmental Protection Agency and the Illinois Attorney General's Office," he said.